

### **REMARKS**

Claims 1-55 are pending. Claims 1-8, 10-18, 20-22, 26-34, 38-46, 48-50, and 52-54 stand rejected under 35 U.S.C. § 103(a). Claims 9, 19, 23-25, 35-37, 47, 51, and 55 have been objected to. Claims 1, 9, 10, 17, 18, 26, 27, 35, 43, 45-48, 51, and 55 have been amended and claims 56-62 have been newly added. Accordingly, after entry of this amendment, the pending claims will be claims 1-62. No new matter has been added.

The Applicant appreciates the Examiner's thorough examination of the subject application. The Applicant respectfully requests reconsideration of the subject application based on the above amendments and the following remarks.

### **35 U.S.C. § 103(a) REJECTIONS**

The Examiner rejected claims 1-8, 10-18, 20-22, 26-34, 38-46, 48-50, and 52-54 under 35 USC 103(a) as being unpatentable over U.S. Patent Number 6,052,491 to Clatanoff, et al. ("Clatanoff" or the "Clatanoff Reference") in view of U.S. Patent Number 6,724,437 to Funke, et al. ("Funke" or the "Funke Reference"). The Applicants respectfully traverse these rejections based on the above amendments and for the reasons provided below.

The invention as claimed provides structure and methods for adding a noise signal to a digital video signal before the digital data are treated with a bit-length reducing process and for rounding down the less significant bit portion from the digital video signal having added thereto the noise signal. This combination provides a simplified circuit structure.

The Clatanoff reference, on the other hand, discloses a conventional error diffusion circuit for reducing a bit length of a digital video signal. See, e.g., Clatanoff, col. 6, lines 7 to 17; Fig. 6. Specifically, Clatanoff includes structure that adds a cumulative error signal to a digital video signal before the data are treated with a bit-

length reducing process. The Examiner admits, however, that Clatanoff fails to disclose the structure of adding a noise signal to the digital video signal before being treated with the bit length reducing process. There is no suggestion or motivation in Clatanoff for one of ordinary skill in the art to replace the cumulative error signal with the noise signal to realize the simplified circuit structure of the present invention.

Furthermore, the Funke reference discloses structure for adding a noise signal to an analog video signal to suppress generation of a dither matrix pattern. According to Funke, the noise signal is adopted for suppressing the generation of the dither matrix pattern for analog signals. This has nothing to do with digital signals. Thus, there is no suggestion or motivation in Funke for one of ordinary skill in the art to add a noise signal to a digital video signal.

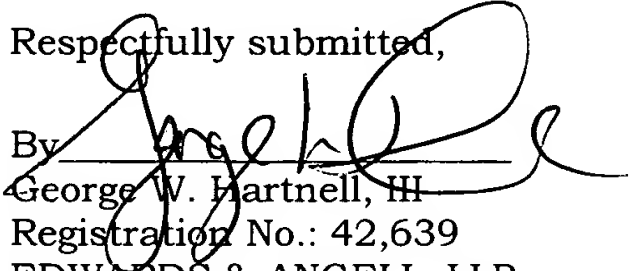
By combining Clatanoff and Funke, those of ordinary skill in the art would merely achieve the structure of a cumulative error signal to the signal as converted. Moreover, the characteristic structure of adding the noise signal to the digital video signal and rounding down the less significant bit portion from the digital video signal having added thereto the noise signal would not have been suggested from the combination of the references cited.

Accordingly, it is respectfully submitted that, claims 1-8, 10-18, 20-22, 26-34, 38-46, 48-50, and 52-54 are not made obvious by Clatanoff in view of Funke, and further, satisfy all of the requirements of 35 U.S.C. § 100, et seq., especially § 103(a). Accordingly, claims 1-8, 10-18, 20-22, 26-34, 38-46, 48-50, 52-54, and new claims 56-62 are allowable. Moreover, it is respectfully submitted that the subject application is in condition for allowance. Early and favorable action is requested.

The Applicants believe that no further fees are due. However, if for any reason a fee paid is inadequate or credit is owed for any excess fee paid, you are hereby authorized and requested to charge or credit Deposit Account No. 04-1105 under Order No. 55,707 (70940).

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Respectfully submitted,

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